

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	Case No. 17-11045-CMB
	:	
Burton O. Sines, Jr.	:	
Dbu Bud Sines Contracting	:	
Leora A. Sines	:	
Aka Leora Ann Chimera	:	Chapter 13
Debtors	:	
	:	
Burton O. Sines, Jr.	:	
Dbu Bud Sines Contracting	:	Document No.:
Leora Sines	:	
Aka Leora Ann Chimera	:	
Movant	:	
	:	
vs.	:	Hearing date:
	:	Hearing Time:
	:	
SN Servicing Corporation as	:	
Servicer for US Bank Trust National	:	
Association, as Trustee of the	:	
Bungalow Series IV Trust	:	
	:	
Respondent	:	
	:	
Ronda J. Winnecour, Trustee	:	

**MOTION TO RECONSIDER GRANTING SN SERVICING CORPORATION AS
SERVICER FOR US BANK TRUST NATIONAL ASSOCIATION, AS TRUSTEE OF
THE BUNGALOW SERIES IV TRUST'S MOTION FOR RELIEF FROM
AUTOMATIC STAY**

NOW COMES the Debtor, by and through their attorney, Samuel M. DiFatta, Esquire and files the within Motion to Reconsider Granting SN Servicing Corporation as Servicer for US Bank Trust National Association, as Trustee of the Bungalow Series IV Trust's Motion for Relief From Automatic Stay, and in support thereof aver as follows:

1. SN Servicing Corporation filed a Motion for Relief From the Automatic Stay on March 7, 2023.

2. Debtor filed a Response to the Motion on March 15, 2023.

3. A hearing was held on April 17, 2023 and at that hearing the Court granted the Motion for Relief From the Automatic Stay.

4. Debtor requests that the Order granting relief be reconsidered in light of new information that was not available at the time of the hearing.

5. Debtor can obtain \$2,000 - \$2,500 from a relative to put towards the arrears. That payment will almost halve the arrears. In addition, Debtor's Plan payment can be increased \$36.00 per pay, (Debtor is paid weekly), and that will allow for a successful Chapter 13 Plan.

6. Debtor only has eighteen months left in the Plan and when they successfully complete the Plan, the Creditor will be made whole. As it stands now, it will take the Creditor at least a year to get through foreclosure, depending on what defenses the Debtor may raise or what programs are available through the Common Pleas Court.

7. Debtor agrees that the Motion For Relief can be granted with a clause that keeps the order on hold as long as the Debtor makes all Chapter 13 Plan Payments. If the Debtor misses one payment, the Creditor can file a Certificate of Default and with Court approval either with or without hearing, The Order will be effective.

8. This type of order does not prejudice the Creditor in any way and places all responsibility directly on the Debtor.

WHEREFORE Debtors respectfully requests this Honorable Court to Modify SN Servicing Corporation as Servicer for US Bank Trust National Association, as Trustee of the

Bungalow Series IV Trust's Motion for Relief from Stay Order to allow for the case to continue to conclusion.

Respectfully submitted,

Date: April 26, 2023

/s/ Samuel M. DiFatta
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